

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

Dr. Kristine A. Holmberg,  
Mr. Frank J. Salvucci,

Plaintiffs,

- Against -

Newton Wellesley Hospital,  
Defendant,

FILED  
IN CLERKS OFFICE

2010 MAR 10 P 1:04

U.S. DISTRICT COURT  
DISTRICT OF MASS.

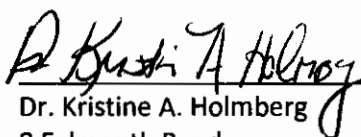
COMPLAINT

PLAINTIFF DEMANDS TRIAL BY JURY

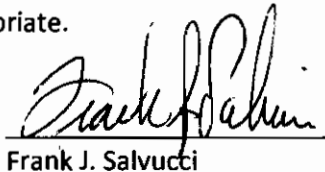
1. At all times hereinafter mentioned, plaintiffs were and still are residents at 8 Falmouth Road, Watertown Massachusetts, 02472.
2. Defendant, is a non-profit , tax-exempt Institution located at 2014 Washington Street, Newton Lower Falls 02462
3. The jurisdiction of this court is invoked pursuant to 42 U.S.C 1983.
4. When admitted to on March 14, 2008 to the Emergency Room of Newton-Wellesley Hospital, the following occurred.
  - A. The attending Nurse misled Mr. Salvucci regarding the administration of treatment to Dr. Holmberg.
  - B. Hospital personnel abandoned Dr. Holmberg.
  - C. The unsolicited and unexpected invasion of the Watertown Police resulted in a clear violation of Holmberg's 4<sup>th</sup> amendment rights. The right to a reasonable expectation of privacy while in the confines of the hospital, was violated. Photographs and interrogation were all performed without my consent. As a result, Holmberg's treatment was interrupted and therefore the best quality of care was not provided.
  - D. The privacy officer failed in her duties to enforce our concerns in the matters of proper protocol.
  - E. Security failed to respond to Mr. Salvucci's repeated requests for safety during the WPD intrusion. There was no nurse present, while they were taking pictures and handling the area that was injured, therefore producing more pain.
  - F. Due to the above occurrence, legal Council had to be retained for both myself and Mr. Salvucci, therefore incurring costly expenses.
5. WHEREFORE, plaintiffs demand: Money damages in the amount of \$50,000.

We hope that the hospital examines its operations to ensure that this does not happen in the future and that the best quality of care is given in the future.

Any further relief which the court may deem appropriate.

 3/9/2010  
Date

Dr. Kristine A. Holmberg  
8 Falmouth Road  
Watertown, MA 02472  
617-744-1660 / 617-794-0043

 3/9/2010  
Date

Frank J. Salvucci  
8 Falmouth Road  
Watertown, MA 02472  
617-744-1660 / 617-513-0060

March 10, 2010

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

FILED  
IN CLERKS OFFICE  
2010 MAR 10 P 1:04  
U.S. DISTRICT COURT  
DISTRICT OF MASS.

Dr. Kristine Holmberg,  
Mr. Frank Salvucci,

Plaintiffs,

-Against-

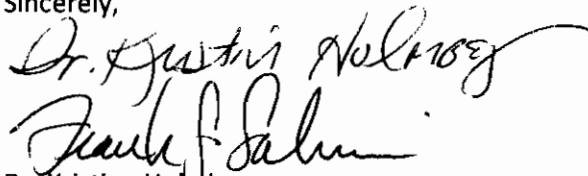
Newton Wellesley Hospital

Defendant,

Regarding the matter mentioned above, please make all correspondence to Mr. John P. Puleo, of Hamrock & Tocci Counsellors At Law. 101 Main Street, Cambridge Ma. 02142. He is representing Newton-Wellesley Hospital.

Since we are acting Pro Se at this time, all other communication should be sent directly to the attention of the plaintiffs.

Sincerely,



Dr. Kristine Holmberg  
Mr. Frank Salvucci

cc: John Puleo, Attorney, Hamrock and Tocci